

Info sent to Barry

From: "Achimov, Donna (FINTRAC/CANAFE)" <donna.achimov@fintrac-canafe.gc.ca>
To: "Bedard, Annie (FINTRAC/CANAFE)" <annie.bedard@fintrac-canafe.gc.ca>, "Yong, Liz (FINTRAC/CANAFE)" <elizabeth.yong@fintrac-canafe.gc.ca>, "Rochette, François (FINTRAC/CANAFE)" <francois.rochette@fintrac-canafe.gc.ca>, "Pouliot, David (FINTRAC/CANAFE)" <david.pouliot@fintrac-canafe.gc.ca>, 's.38 (FINTRAC/CANAFE)' <s.38@fintrac-canafe.gc.ca>
Date: Tue, 15 Feb 2022 22:25:36 +0000

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From: Achimov, Donna (FINTRAC/CANAFE)
Sent: February 15, 2022 5:25 PM
To: Bennett, Patricia (FINTRAC/CANAFE) <Patricia.Bennett@fintrac-canafe.gc.ca>; MacKillop, Barry (FINTRAC/CANAFE) <Barry.MacKillop@fintrac-canafe.gc.ca>
Cc: Ryan, Annette (FINTRAC/CANAFE) <annette.ryan@fintrac-canafe.gc.ca>; Rochette, François (FINTRAC/CANAFE) <Francois.Rochette@fintrac-canafe.gc.ca>; Gibb, Darren (FINTRAC/CANAFE) <Darren.Gibb@fintrac-canafe.gc.ca>; s.38
s.38@hotmail.com>
Subject: RE: limited to one for briefing
Importance: High

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Barry am talking to the team – we will send you a one pager. Am going to send some info for your hip pocket:

- ~ Currently 2,500 MSBs+ are registered, with over 25,000 locations across Canada
- ~ Under 10 PSP and Crowd Funding Platforms received to date
- ~ IT Systems being modified, and we have reallocated resources to this priority
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Background Ineligibility Criteria

Under the **Proceeds of Crime (Money Laundering) and Terrorist Financing Act (PCMLTFA)**, **section 11.11:**

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An individual or an [entity](#) found guilty of any of the following offences:

- a money laundering offence under subsection 462.31(1) of the *Criminal Code*;
- a terrorist financing offence under section 83.02, 83.03 or 83.04 of the *Criminal Code*;
- an offence under section 83.12 of the *Criminal Code* that was against section 83.08;
- an offence under the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act*, if found guilty on indictment;
- an offence under sections 83.18 to 83.231, 99 and 100, subsection 163.1(3) and sections 279.01 to 279.02, 286.2 and 346 of the *Criminal Code* for any of the following:
 - participation in, or facilitation of, activities of a terrorist group,
 - the commission of an offence for such a group,
 - the instructing, directing or facilitating of that offence;
 - weapons trafficking or possession for purpose of weapons trafficking
 - child pornography
 - human trafficking
 - sexual services
 - extortion

- an offence under sections 354 or 467.11 to 467.13 of the *Criminal Code* for any of the following:
 - possession of property obtained from crime,
 - participation in activities of a criminal organization, or
 - the commission of, or instruction to commit, an offence for such an organization;
- a conspiracy, an attempt to commit, being an accessory after the fact for, or any counselling for any of the offences above.
- an offence under section 117 or 118 of the *Immigration and Refugee Protection Act*, an offence under section 131 of that Act in relation to an offence under section 117 or 118 of that Act.
- a *foreign national*, as defined in section 2 of the *Justice for Victims of Corrupt Foreign Officials Act* (Sergei Magnitsky Law), who is subject of an order or regulation made under paragraph 4(1)(a) of that Act or whose property is the subject of an order made under paragraph 4(1)(b) of that Act;
- a *politically exposed foreign person*, as defined in subsection 2(1) of the *Freezing Assets of Corrupt Foreign Officials Act*, whose property is the subject of an order or regulation under paragraph 4(1)(a) or an order under paragraph 4(1)(b) of that Act
- An offence under section 159 of the Customs Act or subsection 239 (1) or (1.1) of the Income Tax Act.

An individual or an [entity](#) found guilty of an offence or convicted more than once for any of the following:

- Fraudulent transactions relating to contracts and trade under Part X of the *Criminal Code*; or
- Any offences under the *Controlled Drugs and Substances Act* (other than offences under subsection 4(1) of that Act for possession).

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From: Bennett, Patricia (FINTRAC/CANAFE) <Patricia.Bennett@fintrac-canafe.gc.ca>
Sent: February 15, 2022 5:19 PM
To: MacKillop, Barry (FINTRAC/CANAFE) <Barry.MacKillop@fintrac-canafe.gc.ca>
Cc: Achimov, Donna (FINTRAC/CANAFE) <Donna.Achimov@fintrac-canafe.gc.ca>; Ryan, Annette (FINTRAC/CANAFE) <Annette.Ryan@fintrac-canafe.gc.ca>; Rochette, François (FINTRAC/CANAFE) <Francois.Rochette@fintrac-canafe.gc.ca>; Gibb, Darren (FINTRAC/CANAFE) <Darren.Gibb@fintrac-canafe.gc.ca>
Subject: limited to one for briefing

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Hi – for 6:30 dial in, FIN indicates we are limited to 1 (as are they), so have asked for Barry to be able to cover off intel aspect.

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Patricia Bennett (she / her | elle)

Strategic Policy & Reviews | Politiques stratégiques et révisions
 Financial Transactions and Reports Analysis Centre of Canada | Centre d'analyse des opérations et déclarations financières du Canada

Patricia.Bennett@fintrac-canafe.gc.ca / Cellular: s.38

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Please do not hesitate to respond in the official language of your choice. | I am located on the traditional, unceded territory of the [Anishinaabe Algonquin](#) Peoples.

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N'hésitez pas à me répondre dans la langue officielle de votre choix. | Je suis située sur le territoire traditionnel non cédé des peuples [Algonquin Anishinabés](#).

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